

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MELISSA KAYE,

PLAINTIFF,

-against-

18-CIV-12137(JPC)(JLC)

HEALTH AND HOSPITALS CORPORATION; ELIZABETH FORD;
ABHISHEK JAIN; JONATHAN WANGEL; and PATRICIA YANG
Defendants.

..... X

**DECLARATION OF SPECIAL HAGAN, ESQ.
IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL ESI AND FOR SANCTIONS**

I, SPECIAL HAGAN, declare, pursuant to 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct

- 1) I represent plaintiff MELISSA KAYE, M.D. As such, I am familiar with the facts and circumstances underlying this action. Accordingly, I submit this declaration in opposition to defendants' motion for summary judgment.
- 2) Attached hereto as Exhibit 1 is an Email from Jonathan Wangel Esq. to Chief Corporate Compliance Officer, Catherine Patsos dated March 20, 2019. (ESI2686-ESI2687)
- 3) Attached hereto as Exhibit 2 is an email from Elizabeth Ford, M.D. to Patricia Yang dated May 9, 2019. (ESI2804)
- 4) Attached hereto as Exhibit 3 is an email from Ross MacDonald, M.D. to Elizabeth Ford, M.D. dated June 18, 2019. (ESI2946)
- 5) Attached hereto as Exhibit 4 is Plaintiff's Amended Complaint as uploaded to ECF.
- 6) Attached hereto as Exhibit 5 is the Operating procedure from the Office of Corporate Compliance.

- 7) Attached hereto as Exhibit 6 is the Summary Compliance Memorandum dated May 9, 2019.
(ESI2797-ESI2800)
- 8) Attached hereto as Exhibit 7 is Andrea Swenson's LinkedIn Profile.
- 9) Attached hereto as Exhibit 8 is an Email from Andrea Swenson to Stephen Morello dated
March 7, 2019.
- 10) Attached hereto as Exhibit 9 are Email Exhibits to Yetta Kurland's Motion for Sanctions
against Donna Canfield in the Local 3621 et. al. v. City of New York matter.
- 11) Attached hereto as Exhibit 10 is the Transcript of the July 1, 2015 conference in front of
Judge Fallia in the Catapano Fox v. City of New York matter.

Dated: Queens, New York
November 19, 2020

by: /s/

Special Hagan, Esq.
Attorney for Plaintiff,
Melissa Kaye, M.D.
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